

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

MONICA WAYS	:	Case No. 1:12-cv-450
Plaintiffs	:	Judge BERTELSMAN
		Mag. Judge LITKOVITZ
	:	
-v-		
MIAMI UNIVERSITY OF OHIO	:	
	:	
Defendant		

PLAINTIFFS REPLY TO SHOW CAUSE ORDER

Now comes Plaintiff and respectfully directs the Court's attention to the following supplemental authority:

- 1) Abeita v. TransAmerica Mailings, Inc., 159 F. 3d 246, 251 (6th Circuit 1998) ("tangible psychological injury" not required);
- 2) Black v. Zaring Homes Inc., 104 F. 3d 822, 826 (6th Cir. 1997) (verbal conduct alone sufficient);
- 3) Wasek v. Arrow Energy Services, 682 F. 3d 463, 470 (6th Cir. 2012) (proof of tangible decline in work productivity not required).

Respectfully Submitted,

s/[James E. Kolenich](#)

JAMES E. KOLENICH(0077084)

Kolenich Law Office

9435 Waterstone Blvd. #140

Cincinnati, OH 45249

(513) 444-2150

(513) 297-6065 (Fax)

jek318@gmail.com

Trial Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify the above and all accompanying documents were served via the Court's CM/ECF system June 23, 2014 upon all parties of record and that no party requires or is entitled to service by other means:

s/ [James E. Kolenich](#)

J. E. KOLENICH (0077084)